

EXHIBIT A

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

IN RE: AUTOMOTIVE PARTS
ANTITRUST LITIGATION

No. 12-md-02311
Hon. Sean F. Cox

IN RE : WIRE HARNESS	CASE NO. 2:12-CV-00103
IN RE : INSTRUMENT PANEL CLUSTERS	CASE NO. 2:12-CV-00203
IN RE : FUEL SENDERS	CASE NO. 2:12-CV-00303
IN RE : HEATER CONTROL PANELS	CASE NO. 2:12-CV-00403
IN RE : BEARINGS	CASE NO. 2:12-CV-00503
IN RE : OCCUPANT SAFETY SYSTEMS	CASE NO. 2:12-CV-00603
IN RE : ALTERNATORS	CASE NO. 2:13-CV-00703
IN RE : ANTI-VIBRATIONAL RUBBER PARTS	CASE NO. 2:13-CV-00803
IN RE : WINDSHIELD WIPERS	CASE NO. 2:13-CV-00903
IN RE : RADIATORS	CASE NO. 2:13-CV-01003
IN RE : STARTERS	CASE NO. 2:13-CV-01103
IN RE : AUTOMOTIVE LAMPS	CASE NO. 2:13-CV-01203
IN RE : SWITCHES	CASE NO. 2:13-CV-01303
IN RE : IGNITION COILS	CASE NO. 2:13-CV-01403
IN RE : MOTOR GENERATOR	CASE NO. 2:13-CV-01503
IN RE : STEERING ANGLE SENSORS	CASE NO. 2:13-CV-01603
IN RE : HID BALLASTS	CASE NO. 2:13-CV-01703
IN RE : INVERTERS	CASE NO. 2:13-CV-01803
IN RE : ELECTRONIC POWERED STEERING ASSEMBLIES	CASE NO. 2:13-CV-01903
IN RE : AIR FLOW METERS	CASE NO. 2:13-CV-02003
IN RE : FAN MOTORS	CASE NO. 2:13-CV-02103
IN RE : FUEL INJECTION SYSTEMS	CASE NO. 2:13-CV-02203
IN RE : POWER WINDOW MOTORS	CASE NO. 2:13-CV-02303
IN RE : AUTOMATIC TRANSMISSION FLUID WARMERS	CASE NO. 2:13-CV-02403
IN RE : VALVE TIMING CONTROL DEVICES	CASE NO. 2:13-CV-02503

IN RE : ELECTRONIC THROTTLE BODIES	CASE NO. 2:13-CV-02603
IN RE : AIR CONDITIONING SYSTEM	CASE NO. 2:13-CV-02703
IN RE : WINDSHIELD WASHER	CASE NO. 2:13-CV-02803
IN RE : AUTOMOTIVE CONSTANT VELOCITY JOINT BOOT PRODUCTS	CASE NO. 2:14-CV-02903
IN RE : SPARK PLUGS	CASE NO. 2:15-CV-03003
IN RE : AUTOMOTIVE HOSES	CASE NO. 2:15-CV-03203
IN RE : SHOCK ABSORBERS	CASE NO. 2:15-CV-03303
IN RE : BODY SEALING PRODUCTS	CASE NO. 2:16-CV-03403
IN RE : INTERIOR TRIM PRODUCTS	CASE NO. 2:16-CV-03503
IN RE : BRAKE HOSES	CASE NO. 2:16-CV-03603
IN RE : EXHAUST SYSTEMS -	CASE NO. 2:16-CV-03703
IN RE : CERAMIC SUBSTRATES	CASE NO. 2:16-CV-03803
IN RE : POWER WINDOW SWITCHES	CASE NO. 2:16-CV-03903
IN RE : AUTOMOTIVE STEEL TUBE	CASE NO. 2:16-CV-04003
IN RE : ACCESS MECHANISMS ACTIONS	CASE NO. 2:16-CV-04103
IN RE : DOOR LATCHES	CASE NO. 2:17-CV-04303

THIS DOCUMENT RELATES TO:
End-Payor Actions

**DECLARATION OF EMMA K. BURTON IN SUPPORT OF
ENTERPRISE FLEET MANAGEMENT, INC'S REPLY TO END-PAYOR
PLAINTIFFS' OPPOSITION TO
SUR-REPLY MEMORANDUM AND REQUEST FOR SPECIAL MASTER**

I, Emma K. Burton, declare as follows.

1. I am a partner at the law firm of Crowell & Moring LLP ("Crowell") and represent Enterprise Fleet Management, Inc. ("EFM") in its claim to the End Payor settlements in the class action litigation known as *In re: Automotive Parts Antitrust Litigation*, MDL No. 2311 (E.D. Mich.) ("Auto Parts Matter"). Through my

representation of EFM, I have personal knowledge of information relating to the company's claim in this matter. All of the statements in this declaration are based upon that information and, if called as a witness, I could and would testify competently thereto.

2. I submit this declaration in support of EFM's Reply to End-Payor Plaintiffs' Opposition to Sur-Reply Memorandum and Request for Special Master, ECF No. 2232.

3. End-Payor Plaintiffs ("EPPs") incorrectly assert that counsel for EFM "filed duplicate claims on behalf of EFM's customers based on more than 500,000 of the very same vehicles." ECF No. 2232, PageID.40131.

4. Crowell has claims on file on behalf of EFM customer lessees for exactly 3,964 of the same vehicles as claimed by EFM.

5. On October 12, 2021, EFM proposed to EPPs to forego any recovery for vehicles for which a valid, competing claim was timely filed by a qualifying lessee to the same vehicle. I reiterated this proposal to EPPs on a phone call with Mr. Langham on September 16, 2022.

6. Under EFM's proposal there would be no duplicate recovery based on the same vehicle to multiple claimants.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 19th day of September, 2022, in Washington, D.C.

By: /s/ Emma K. Burton

Emma K. Burton
Crowell & Moring LLP